

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-136[d-f] and
137[m-o] THAT HAVE BEEN OBJECTED TO
January 4, 2002

On December 26, 2001, the Postal Service filed an Objection to respond to my Interrogatories.

Respectfully submitted,

January 4, 2002

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-136 subparts d through f. Since the wording of the DMCS that applies to the handling of First-Class Mail applies equally to the Letters and Sealed Parcels Subclass, the Cards Subclass, and the Priority Mail Subclass, the differences that apply between the three subclasses are relevant to this case and are necessary to fully evaluate the methods by which the service standards meet the requirements of the DMCS which are an indication of the statutory requirements.

DBP/USPS-137 subparts m through o. Without prejudicing the pleadings pertinent to DFC/USPS-9, I am willing to have the response to these subparts disclosed under appropriate protective conditions.

For the reasons given, the Postal Service should be compelled to provide the answers to these interrogatories.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

January 4, 2002

David B. Popkin